

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

A.A.R.P, *et al.*,

*Petitioners-Plaintiffs,*

v.

Case No. 1:25-cv-0059

DONALD J. TRUMP, in his official capacity as President of the United States, *et al*;

*Respondents-Defendants.*

**PETITIONERS-PLAINTIFFS' MOTION FOR LEAVE TO  
APPEAR WITHOUT LOCAL COUNSEL**

Petitioners-Plaintiffs (“Petitioners”) respectfully move this Court to waive the Local Rule 83.10(a) requirement to obtain local counsel residing in or having their principal office within 50 miles of the courthouse. Petitioners are filing an accompanying Memorandum of Law in support of this motion, as well as a Proposed Order for the Court.

Because good cause exists, Petitioners respectfully request that the Court enter an order waiving Local Rule 83.10(a)’s local counsel requirement.

Dated: April 16, 2025

Respectfully submitted,

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Daniel Galindo\*  
Ashley Gorski\*  
Patrick Toomey\*  
Sidra Mahfooz\*  
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/s/Brian Klosterboer  
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Attorneys for Petitioner-Plaintiff

*\*Pro hac vice applications forthcoming*

**CERTIFICATE OF CONFERENCE**

I certify that pursuant to LR 7.1(a), Petitioners' counsel attempted to confer with counsel for Respondents prior to filing by emailing Chad E. Meacham, the United States Attorney for the Northern District of Texas, and seeking the government's position. Petitioners' counsel was not able to obtain a response prior to filing.

Dated: April 16, 2025

/s/ Brian Kosterboer

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 16, 2025, a true and correct copy of the foregoing document was electronically filed via the Court's CM/ECF system which sends notice of electronic filing to all counsel of record. I provided copies of the foregoing motion, declaration, and accompanying memorandum and proposed order via email to the U.S. Attorney's Office, Northern District of Texas to:

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Dated: April 16, 2025

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